U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II
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MEMORANDUM

TO: Steve Cipot - Project Manager
ERRD/NJRB

FROM: Andy Crossland - Geologist
ERRD/PSB/TST

DATE: Thursday, November 15, 2001

SUBJECT: Review of the *Workplan to Evaluated Free Product Remedial Strategies,* L.E. Carpenter, Wharton, New Jersey.

In response to your request, I have reviewed the documents listed above. If you have any questions concerning these comments, please feel free to call me at x4436.

1. Page 2-1: The text states that soils "suspected of lead contamination" will be stockpiled. How is this to be determined? Similarly soils "potentially contaminated with DEHP and BTEX" will be placed on the bench. Is this simply to be by visual inspection (ie. if you can see product)? Also, does this introduce the possibility of spreading the contamination to the bench area, or is it presumed that that depth will already be contaminated? Would it perhaps be more conservative to place the soils on plastic to ensure that contamination is not spread?

2. Page 2-2, Task 2: If the test pits are to be backfilled with washed stone, what happens to the contaminated soils? Will these be shipped off-site as IDW? They cannot simply be left on site.

3. Page 2-2, Task 2: Product thicknesses in the dug recovery wells may not be representative of the effect of trenches, which would presumably use horizontal piping.

4. Page 2-2, Task 3: The text states that sampling for metals "may be necessary." How is this to be determined?

5. Page 2-2, Task 3: The text gives very little detail on the bench scale study. Typically, work plans of this sort give more information about the testing apparatus and specific analysis methods. In addition, it should be clear what parameters will be monitored by